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WRITER'S DIRECT DIAL NUMBER

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July 1, 1997

**Via Certified Mail -- Return Receipt Requested  
and Federal Express**

Mr. Carlton D. Cuffman  
U.S. Environmental Protection Agency  
77 W. Jackson Boulevard - SM-5J  
Chicago, IL 60604-3590

RE: 104(e) Information Request  
Sauget Areas I and II Superfund Sites -  
Sauget/Cahokia, Illinois

Dear Mr. Carlton:

This firm represents Sterling Steel Foundry, Inc. ("Sterling Steel") and responds on its behalf to the Information Request covering the Sauget Areas I and II Superfund Sites ("Sites"). The United States Environmental Protection Agency ("EPA") issued this request on May 20, 1997 under Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"). Sterling Steel received the request on or about May 22, 1997. I requested an extension of time to prepare the response from you on June 20 and received an extension to July 2, 1997 to reply.

The Information Request states that pursuant to Section 104(e)(2) of CERCLA, as amended, the EPA may gather information relevant to site(s) and to enforce compliance with the statute, seeking penalties for failure to comply. Sterling Steel's response is in accordance with this statement in the Information Request, but Sterling Steel objects to some of the questions as being overly broad and beyond the scope of the statutory section cited.

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JUL 01 1997  
SUPERFUND PROGRAM  
MANAGEMENT BRANCH

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The following provides a brief overview of Sterling Steel's operation of the facility located at 2300 Falling Springs Road in Sauget, Illinois ("Facility"):

On or about August 30, 1982, Sterling Steel acquired certain assets of the former Sterling Steel Casting Co. (an entity that is completely separate from and unrelated to St. Louis Steel Casting or Sterling Steel) as an assignee under a purchase agreement between its parent company, St. Louis Steel Casting, Inc., and Sterling Steel Casting Co. Sterling Steel Casting Co. shut down its business at this Facility prior to Sterling Steel's purchase. Production at the shuttered Facility was not commenced by Sterling Steel until February 1983. Therefore, Sterling Steel operated the Facility less than 2 years at the tail end of the period for which EPA is requesting information.

Based on the information contained in the Site History provided by EPA with the Information Request, only one of the sites of the two Areas was active during the time Sterling Steel was in operation. This site, Site P, is an inactive landfill which was operated by Sauget and Company between 1972 and 1984. All of the other sites were inactive prior to 1980, well before Sterling Steel began operation at the Facility. Sterling Steel did not utilize Site P for offsite disposal of waste.

I am providing this response on behalf of Sterling Steel without personal knowledge of the facts or events described in the documents reviewed or related to me in my interview of Mr. Roy Lussow as to his knowledge of the matters contained in the Information Request. Based upon my inquiry, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. Attached at Tab E is an affidavit of Mr. Lussow stating that a diligent interview and record search has been completed in preparation of this response.

### **INFORMATION REQUEST ANSWERS**

1. Answer:

Mr. Roy Lussow, Vice President and General Manager  
Sterling Steel Foundry, Inc.  
2300 Falling Springs Road  
Sauget, IL 62206  
(618) 337-6123

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2. Answer:

Letter dated November 28, 1989 from Illinois Environmental Protection Agency concluding Sterling Steel is not a PRP with respect to Sauget Area II sites (Tab A); Phase I Investigation Report dated February 1996 for Industrial Gas Products (Tab B); Letter Dated February 24, 1992 from Illinois Environmental Protection Agency advising of CERCLA Screening Site Inspection (Tab C); Corporate documents of Sterling Steel Casting Co. issued by the State of Illinois, Purchase Agreement between St. Louis Steel Casting and Sterling Steel Foundry Co., Agreement and Assignment between St. Louis Steel Casting and Sterling Steel, Conveyance, Mortgage and Promissory Note by Sterling Steel to Sterling Steel Casting, Warranty Deed to Sterling Steel, Assignment of Note to William and Mary Shive from Sterling Steel Casting and Release of Mortgage (Tab D).

3. Answer:

Mr. William J. Shive, majority shareholder and principal of the former Sterling Steel Casting Co.

Last known address: P.O. Box 1264  
Effingham, IL 62401

4. Answer:

The Sterling Steel Facility at 2300 Falling Springs Road does not have an EPA Identification Number as it generates no hazardous wastes as a result of its operations.

5. Answer:

Roy Lussow, Vice President and General Manager  
Sterling Steel Foundry, Inc.  
2300 Falling Springs Road  
Sauget, IL 62206  
(618) 337-6123

6. Answer:

No known releases of hazardous materials have occurred from Sterling Steel's Facility.

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7. Answer:

No person has arranged for the disposal, treatment, discharge or release of hazardous materials from Sterling Steel's Facility at or to any of the Sauget Area sites during Sterling Steel's operation of the Facility during the period set forth in the Information Request.

8. Answer:

Sterling Steel produces custom carbon steel and manganese steel (Hadfield) castings. Byproducts include spent foundry sand, popcorn slag (aluminum oxide) and very minor amounts of quench water scale. All of these byproducts have been tested and found to be nonhazardous.

9. Answer:

Two types of casting processes are conducted at this Facility — "green" sand castings and "no bake" sand castings. Both processes use casting sand and a binder to make "one-time" sand molds to produce the steel castings. "Green" sand consists of casting sand and a bentonite clay binder. At the proper moisture content, the clay binds the sand to form the mold. Once molten steel is poured into the mold, the moisture is driven off and the sand falls away from the casting. The "no bake" sand consists of casting sand and a two part, chemical binder (Alphacure and Alphasert) that binds the sand to form the mold. The molten steel causes the binding to deteriorate and the sand falls away from the casting. The steel cast is removed for finishing and the sand is returned to a pulverizer, combined with new sand and reused. The melting process by which the steel becomes molten occurs in electrical induction furnaces. Small amounts of aluminum are added to the melting pot which forms oxides with other impurities that float to the top and are skimmed off as "popcorn" slag. Some castings are cooled at room temperature, and others are heat-treated by placing the casting into a quench tank filled with water. Approximately 10-12% of the casting sand is wasted each day as special (nonhazardous) waste. The casting is then finished through sandblasting or shotblasting.

10. Answer:

None of the listed chemicals were used, purchased, produced or stored at the Facility during its operation by Sterling Steel beginning in February 1983 through 1985.

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11. Answer:

None of the listed chemicals was used, purchased, produced or stored at the Facility during its operation by Sterling Steel beginning in February 1983 through 1985.

12. Answer:

None of the pictured catalytic agents were used at the Facility during the period of Sterling Steel's operation of the Facility beginning February 1983 through 1985.

13. Answer:

Waste casting sand, minor amounts of quench tank scale, baghouse dust, and popcorn slag (aluminum oxide) were accumulated on site between February 1983 and the end of 1985. Off-spec castings were re-melted and not disposed of off-site. General debris (pallets, office trash, etc.) were disposed of by a local trash hauler.

14. Answer:

Facility operations did not change between February 1983 and the end of 1985.

15. Answer:

The Facility did not have a laboratory and did not dispose of any contaminated soil or contaminated clothing or protective gear, other than possibly disposable paper respirators (i.e., dust masks), during the period between February 1983 and the end of 1985. If such disposable respirators were used, they would have been disposed of with the general plant debris.

16. Answer:

Sterling Steel had no record or recollection of utilizing any of the companies listed.

17. Answer:

Illinois EPA determined Sterling Steel had no responsibility for the clean-up of the Sauget Treatment Plant lagoons and ponds on the basis that Sterling Steel was not in operation until after the time the Sauget Treatment Plant ceased operation. See enclosed letter from Illinois EPA dated November 28, 1989, at Tab A.

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18. Answer:

Sterling Steel did not spill or discharge process wastewater, sanitary wastewater or liquid chemical wastes or petroleum products into Dead Creek.

19. Answer:

Sterling Steel did not operate this Facility prior to its hook up to the Village of Sauget's process water sewer interceptor system, if any such hook up occurred. The Facility was hooked up to the American Bottoms treatment plant during Sterling Steel's operation of the Facility and only sanitary wastewater was discharged from the Facility.

20. Answer:

All sanitary wastewater from this Facility is discharged into the American Bottoms Regional Wastewater Treatment Facility. No industrial process waters are discharged as such waters are recycled and ultimately consumed in the casting process.

21. Answer:

Sterling Steel has no copies of any permits issued by local government authorities to Sterling Steel between February 1983 and 1985.

22. Answer:

The facility has no PCB items and maintains no such documents.

23. Answer:

Sterling Steel has not performed any testing of groundwater to determine groundwater flow or quality on or around the Facility or on or around any of the referenced Sauget Area sites. However, a potential purchaser of a lessee of some of Sterling Steel's property, Industrial Gas Products located at 2350 Falling Springs Road in Sauget, Illinois, has performed some groundwater investigation on its property. Enclosed at Tab B is a copy of the report prepared by RUST Environment & Infrastructure provided to Sterling Steel.

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24. Answer:

Sterling Steel has not taken any measures which characterize, measure, sample or in any way test for the presence of hazardous materials at or around any of the referenced Sauget Area sites. Illinois EPA did conduct a CERCLA Screening Site Inspection of the Facility in March 1993. Sterling never received a copy of that investigation and the Facility is not a part of any of the referenced Sauget Area Sites (see Tab C).

25. Answer:

Sterling Steel acquired the property in August 1983 as an assignee of the purchaser (St. Louis Steel Casting Co., the parent of Sterling Steel) of certain assets of Sterling Steel Casting Company (See Tab D). Sterling Steel Casting Company under various corporate names - Sterling Electric Steel Casting Co., (July 10, 1922), Sterling Steel Co. (April 14, 1923), and Sterling Steel Casting Co. (August 18, 1928) -- operated the facility since 1922 (See Tab D). Previous ownership/operation is unknown. Sterling Steel's tenant, Industrial Gas Products, commenced its lease of a portion of Sterling Steel's acquired property on July 1, 1987.

26. Answer:

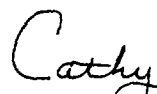
Sterling Steel has no such results or reports responsive to any questions herein.

27. Answer:

See Tab D for Purchase Agreement between St. Louis Steel Casting and Sterling Steel Foundry Co., Agreement and Assignment between St. Louis Steel Casting and Sterling Steel, Conveyance, Mortgage and Promissory Note by Sterling Steel to Sterling Steel Casting, Warranty Deed to Sterling Steel, Assignment of Note to William and Mary Shive from Sterling Steel Casting and Release of Mortgage.

If you have any further questions, please contact me.

Very truly yours,

  
Cathleen S. Bumb

Enclosures

cc w/encl.: Mr. Roy Lussow

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